



Land at Sodbury Road, Wickwar

Proof of Evidence of:

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BA (Hons), MA, ACIfA

In respect of:

Heritage Matters

On behalf of:

Bloor Homes South West

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Section 1 Summary

1.1 My Proof of Evidence has been prepared in response to, and thereafter addresses, Reason for Refusal (RfR) 1 of South Gloucestershire Council's Statement of Case (**CD 7.2**) in respect of the Outline Planning Application P22/01300/O, for which the appellant submitted an appeal against its non-determination by the Council and the Council responded in turn by proposing two putative reasons for refusal, one of which makes reference to heritage matters.

1.2 In light of the background above, RfR 1 identified in the Council's Statement of Case alleges the following:

"1) The adverse impacts of the proposal with regard to:

- *Less than substantial harm to South Farm - great weight*
- *Less than substantial harm to Frith Farm - great weight*
- *Less than substantial harm to Wickwar Conservation Area - great weight,*
- *Increase reliance on car borne transport - substantial weight,*
- *Landscape Harm - significant weight*
- *Conflict with Spatial Strategy -limited weight*
- *Loss of Grade 3 agricultural land - limited weight*
- *Recreational pressure on SSSI - limited weight*

significantly and demonstrably outweigh the benefits of the proposal, which are:

- *Provision of housing - significant weight,*
- *Affordable housing - significant weight,*
- *Provision of self-build plots - significant weight,*
- *Provision of new jobs - limited weight,*
- *Other benefits (potential for a shop, redirected Public Right of Way, highway improvements and connections) - limited weight*
- *and therefore, applying paragraph 11(d)(ii) of the NPPF, permission should be refused."*

- 1.3 The effect of the appeal proposals on the historic environment is identified as one of the five main issues set out by the Inspector in their note of the Case Management Conference which is dated 07 September 2023.
- 1.4 Paragraph 4.2 of the Council's Statement of Case (**CD 7.2**) sets out its case on heritage matters and identifies that:
- "The natural and historic environment is a finite and irreplaceable resource, and the protection of heritage assets is a priority nationally, as well as one for the Council. The Council will show that the appeal proposal will result in less than substantial harm (at the lower end of the scale) to the setting and significance of the Grade II* listed Frith Farm and Grade II Listed South Farm. It will also show that the proposal will cause less than substantial harm to the Wickwar Conservation Area (at a moderate level). Great weight needs to be given to these harms."*
- 1.5 However, there is now common agreement with the Council that the appeal proposals would:
- Result in less than substantial harm to the significance of the Grade II listed building South Farmhouse (1321153) at the lower end of the spectrum; and
 - That there is no harm to the special architectural or historic interest of the Wickwar Conservation Area.
- 1.6 The assessment of no harm to the conservation area is in accordance with that of the Council's Conservation Officer, who (in a Memorandum dated 07 March 2023, **CD 3.4**) also assesses no harm to its character and appearance, which would be preserved. Thus, two heritage experts have both assessed the proposals and drawn the same conclusion in terms of this designated heritage asset.
- 1.7 Regarding the Grade II* listed building Frith Farmhouse (1128768), my assessment concludes that the appeal proposals would change its wider setting but would result in no harm to its significance.
- 1.8 Previously, I prepared an Archaeological and Heritage Baseline Assessment (edp6190_r003: **CD 1.12**), a Heritage Impact Assessment (HIA) (edp6190_r005: **CD 1.13**) and a Heritage Addendum (edp6190_r008: **CD 2.9**) which were submitted with the outline planning application by the appellant. These documents draw the same conclusions as above regarding the three heritage assets in question.
- 1.9 The assessment regarding the three heritage assets is summarised in the paragraphs below.
- 1.10 Regarding the Wickwar Conservation Area, the appeal site is not within the conservation area, rather it is located c.330m to the south of its boundary. As such the proposed development of the appeal site could only affect the conservation area's wider setting.

- 1.11 The majority of the conservation area's special interest (or significance) is bound up in the buildings, streets and spaces within the designated area and therefore the asset's setting only makes up a small or minority portion of the conservation area's total special interest.
- 1.12 A Character Appraisal was prepared by the Council and adopted as Supplementary Planning Guidance in 1998 (**CD 4.14**). Whilst this document is now c.25 years old, my assessment still concurs with its description of the conservation area and assessment of its special interest.
- 1.13 In this regard, it is assessed that the majority of the conservation area's special interest relates to:
- The preserved layout of the village's historic core areas which relates to the medieval evolution of the settlement; and
 - The village's historic buildings which contain its architectural interest, and which form two key groups: a continuous frontage of buildings along High Street and scattered buildings at and around the church at the north end of the village.
- 1.14 Other elements which contribute to its special interest include:
- Its archaeological interest, particularly in terms of the deposits related to its Anglo-Saxon history and former manor near the church;
 - Mature trees, which particularly add character to the more open and greener northern part of the conservation area;
 - The use of local stone - in the architecture of the vernacular buildings, and in the stone walls which generally mark boundaries around the village; and
 - Important views.
- 1.15 Important views are highlighted on a plan at page 8 of the Character Appraisal (**CD 4.14**) and include internal views as well as views out to the east and north.
- 1.16 The conservation area includes fields to the west of the village, included in the designation not because they contain elements of special interest, but to "*protect the village setting and views*" such that views eastwards, back to the village, can be attained.
- 1.17 The conservation area's setting of agricultural land to the north, west and south represents an aspect of the setting of the conservation area that contributes positively to its character and appearance, but only in so much as the village can be experienced in views from and adjacent to a landscape of agricultural fields. The surrounding agricultural fields in these directions make a minor contribution to the conservation area's significance whereby their character as agricultural fields reflects the village's historic setting and, in views to the village, their openness allows for an appreciation of its historic form.
- 1.18 Modern houses to the east of the village do not impose on areas of historic character and appearance. As such, they are assessed as a neutral element of the conservation area's

setting. This assessment is reflected in the Council's adopted Character Appraisal, where it states that:

"Today, despite some modern development mainly on the village edges, the medieval layout and historic character of the former market town remains reasonably intact and is an important part of our heritage."

- 1.19 This statement reflects that fact that, even with 20th century development right against the eastern and western edges of the historic core of the village at High Street, the conservation area's historic layout and character have been preserved to the extent that they are still highly legible and thus significant.
- 1.20 The conservation area's setting to the south is defined by its experience on the approach on Sodbury Road where the conservation area and its buildings do not become visible in views northwards up the road until c.150m to the south. This approach is characterised by the presence of several historic buildings as well as by views out to the west across agricultural land whereby the conservation area's 'rural setting' can be appreciated.
- 1.21 These elements and the availability of these views are an aspect of the conservation area's setting that makes a minor positive contribution to its character and appearance, relating to its special interest as a historic village defined by stone-built historic buildings set on the edge of its agricultural fields.
- 1.22 To the south, where there is no visual experience of the conservation area from Sodbury Road, the road has developed a modernised character and development in this part of the village is not experienced with or adjacent to the conservation area and its buildings, and so it has no influence on how its character and appearance are experienced and neither does it make a contribution to it.
- 1.23 The appeal site is only experienced from the conservation area in views south from the western part of the conservation area. These views out from the conservation area are not identified in the Character Appraisal as 'important views' and are not attained from a part of the conservation area which possesses any great degree of inherent special interest.
- 1.24 On account of their presence in the southerly view outwards from the western part of the conservation area, the north-western field at the appeal site and the western edge of the field to the south (which is also part of the appeal site) form part of the setting of the Wickwar Conservation Area. In view of the fact that they comprise agricultural fields enclosed and separated by mature hedgerow boundaries, they are assessed as representing only a very small part of the conservation area's wider setting of agricultural land that in its totality contributes to its overall significance to a minor degree with the appeal site making an extremely minor contribution to the heritage significance of the Wickwar Conservation Area.
- 1.25 The appeal proposal would minimise the presence of the proposed development in the view south from the conservation area by incorporating tree planting on the north-western and western boundaries of the appeal site, with development set back from this edge. Once the tree line has matured the visual effect of the proposed development would be softened and the general character of the view south out of the conservation area would continue to

reflect the village's historic, farmland setting of agricultural fields. Furthermore, only 7.89 hectares (ha) of agricultural land from a total resource of c.308ha located within 1km of the conservation area to the north, west and south would be developed by the appeal proposals.

- 1.26 As such, insofar as the conservation area's wider setting contributes to its special interest (or its heritage significance), this minor contribution would be maintained by the implementation of the appeal proposals in view of the retention of the majority of the agricultural land adjacent to and in its wider vicinity. Hence, there would be no adverse impact and no harm caused as a result.
- 1.27 Regarding Frith Farmhouse, the appeal site is located c.440m to the east of the listed building. As such, the development of the appeal site could only affect the listed building's wider setting and would have no impact whatsoever on its built form or fabric.
- 1.28 It is assessed that the majority of the listed building's heritage significance is bound up in that built form and fabric and in comparison, the asset's setting only makes up a small or minority portion of its total significance.
- 1.29 The building derives the greater part of its significance from its architectural interest which is particularly concentrated in its internal features and western parts of the building that retain older, 16th century fabric. The eastern parts do retain some significance, but their modern appearance is a recent construct, albeit influenced by the appearance of the 18th/19th century finish of the eastern elevation of the house, which has been reinterpreted in a restoration carried out in 2013.
- 1.30 In terms of the building's setting, which makes a lesser or minority contribution to its significance, there is no evidence that the building was intentionally sited, orientated or designed to take advantage of or embrace outwards views towards or across the wider surrounding landscape.
- 1.31 Surrounding areas possess a historical or functional association with the farmhouse. Of these, the gardens to the immediate south contribute most to the building's significance. Other adjacent areas represent former yards and working farm buildings but the area to the immediate east was redesigned in 2013, enclosed with a new wall and with old structures removed and new structures constructed.
- 1.32 Because of the 2013 development, the yard to the east of the house is less concordant with its historic character and function and its relationship with the farmhouse has changed. The change in character means that this space has a slightly diminished historic, functional association with the house and contributes only to a moderate degree to its significance.
- 1.33 Further to the north and east are two modern agricultural buildings which are assessed as having a neutral presence in the asset's setting. Beyond these are a series of horse paddocks which reflect the house's historic setting and are assessed as making a moderate positive contribution to the significance of the listed building.
- 1.34 The wider landscape beyond the paddocks in all directions comprises agricultural fields bounded by hedgerows. These surrounding locations make a minor positive contribution to

the house's significance with more distant fields making no more than a very minor contribution. Historically, as per the 1838 Tithe map of the Parish of Yate, the estate comprised the surrounding fields to the north, west, east and south and extended across further agricultural land to the west. Eastwards, the estate ended at the brook situated c.180m to the east of the house, which also marks the parish boundary with Wickwar parish. As such, the estate did not extend to or include the appeal site which makes no contribution to the listed building's significance in respect of any historic, functional association.

- 1.35 A view to the appeal site from Frith Farmhouse is only possible from the house's first floor windows on its eastern elevation. The enclosure of the yard to the east by walls, a cherry tree and buildings screen views of the appeal site from ground-level.
- 1.36 Consequently, in summary, it is apparent that part of the appeal site is part of the distant, wider setting of Frith Farmhouse. However:
- The windows at the farmhouse from where the view is available were unlikely to have been intended as viewpoints and thus views from them have little relevance to the architectural and historical interest of the building;
 - The appeal site forms only a very small part of the agricultural fields visible in a narrow view from the first floor of the farmhouse which also includes modern built elements, fences and hedgerows;
 - The land within the appeal site has no historic, functional association with the farmhouse; and
 - There is only a distant view of the farmhouse's roof and part of its side elevation, situated behind vegetation and a modern building, from the appeal site, that has not raised any concerns with the Council's Conservation Officer.
- 1.37 As such, it is assessed that the land at the appeal site makes no contribution to the significance of Frith Farmhouse as a designated heritage asset.
- 1.38 The appeal proposals would be visible from the first-floor windows on the eastern elevation of Frith Farmhouse. However, the availability and scope of this view has little relevance to the significance of the farmhouse. Furthermore, due to being mostly screened and present only in a narrow view characterised by modern development, it is assessed that the appeal proposals would have very little presence in the wider setting of Frith Farmhouse, as experienced from the house, and therefore this change to the asset's setting would not result in any harm to the significance of the listed building.
- 1.39 Regarding the Grade II listed building South Farmhouse, it is located c.28m from the appeal site's northern boundary. Thus, it is assessed that the majority of the listed building's significance is bound up in its built form and fabric. Therefore, the asset's setting only makes up a small or minority portion of the listed building's total significance, and this is the only part that could be affected by the appeal site's development.
- 1.40 There is a historic and functional connection between South Farmhouse and the farmland within the appeal site, whereby the appeal site comprises land associated with

South Farmhouse. The association is most evident where the appeal site forms the surroundings in which the listed building is experienced as a historic farmhouse set within farmland.

- 1.41 From within the appeal site, a clear view of the farmhouse is not possible for the most part, as it is partially or completely screened by intervening modern farm buildings, field boundary hedgerows or the residential buildings and garden boundaries to the south of the farm. The only location within the appeal site from where the house can be experienced with a measure of clarity is from the small field to the immediate south of it, from where views are uninterrupted. This field is assessed as making a minor contribution to its overall significance. The wider appeal site, on account of its historical association, makes only a very minor contribution.
- 1.42 The assessment concludes that the appeal proposals would not affect any of the significance that is contained in the physical fabric of the building because this would be left untouched by the approval and implementation of the development. Likewise, most of the significance derived from the asset's setting would also be undiminished because most of the asset's setting would be unchanged as a result of the proposals.
- 1.43 The small field to the south would retain the openness of the space and the farmhouse would continue to be experienced from it, albeit no longer from a pastoral field. For the rest of the appeal site its character would change although the retention of hedgerows and open space on the western edge of the development would retain a degree of its existing character as agricultural land, notably the present division into three fields.
- 1.44 The assessment concludes that the change in character to part of its historically and functionally associated farmland setting would result in a very minor degree of less than substantial harm to the significance of the Grade II listed building.
- 1.45 In conclusion, my assessment concludes only a very limited degree of less than substantial harm which would be caused to South Farmhouse. This harm must be applied to the paragraph 202 heritage balance outlined in the National Planning Policy Framework (NPPF).
- 1.46 Whilst the decision maker must be mindful of paragraph 199 and its emphasis on "*great weight*" being afforded to the conservation of designated heritage assets such as South Farmhouse, as well as the subsequent paragraph 200 and its requirement for "*clear and convincing justification*" to be provided for any harm to a designated heritage asset, there is nothing in legislation, case law or national planning policy that proscribes harm to a listed building and it is instead for the decision maker to weigh the public benefits of the development against the harms that would be caused in reaching their decision on its acceptability.



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